

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

J. ENDRES,)	CASE NO. 5:17-cv-2408
)	
Plaintiff,)	JUDGE SARA LIOI
)	
v.)	
)	
NORTHEAST OHIO MEDICAL)	
UNIVERSITY, <i>et al.</i>,)	
)	
Defendants.)	

JOINT MOTION FOR TELEPHONE STATUS CONFERENCE

The parties request a telephone status with the Court to discuss next steps to resolve the case. Plaintiff in this matter recently retained new counsel. On March 20, 2020, Plaintiff's counsel filed leave to withdraw and substitute counsel (Doc. #40), and the Court granted the motion on March 23, 2020. Counsel for the Defendants have engaged in substantial settlement discussions, over a period of months with plaintiff's prior counsel, and believed the parties had an agreement in principle to settle the case. Plaintiff's new attorney seeks to continue those settlement discussions, and is working on some proposed language on the non-economic terms of the case that Plaintiff is seeking. Plaintiff also requested (from defense counsel) an extension of the discovery cut-off to protect her client's interests in the event the parties are not able to reach a final settlement agreement.

Respectfully submitted,

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Ohio Attorney General

/s/ Tracy L. Turner – per email auth.

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CERTIFICATE OF SERVICE

The foregoing *Joint Motion for Telephone Status Conference* was filed through the Court's Electronic Filing System on the 30th day of March, 2020. All parties will be notified of this filing through the Court's Electronic Filing System.

/s/ Todd Marti

TODD R. MARTI (0019280)
Principal Assistant Attorney General